



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 4, 2008

Pat Toomey, Treasurer
Club for Growth PAC
2001 L St NW, Suite 600
Washington, DC 20036

Response Due Date:
May 5, 2008

Identification Number: C00432260

Reference: Year End Report (10/18/07 – 12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Schedule A of your report discloses an aggregate year-to-date total(s) for a contribution(s) received from "Donald Streilein," "Steven Apour," "Irene Callahan," "Eugene Brandenburg," "Pete Hudgins," "W. Fletcher," "Edward Delate," "Richard Emery," "William Berg," "A. Augustson," "Stuart Ferguson," "Frederick Kirk," "Robert Bartruff," "Chesley Erwin," "Richard Finn," "David Silbernagel," "Sylvan Auran," "George Gerrodette," "Brian Teepe," "G. Todd," "Doris Hendricks," "Michael Lyster," "Greg Reiman," "William Walker," "John Hagy," "L. Michael Howell," "David Mandalinich," "Dean Cockerill," "William Grant," "Robert Ingersoll," "Gilbert Jones," "Jack McCarthy," "Michael Miller," "Roy Patchell," "Malcolm Powell," "James Wiechmann," Larry "McGregor," "James Reed," "David Lesieur," "Todd Korth," "Anthony Bryant," "Richard Freymond," "Bob Frater," "John James," "John Lowney," "Lelan Whitmire," "William Nolan," "Denis Healy" and "Nicholas Zwick," which appears to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).

2. Schedule A of your report discloses earmarked contributions totaling \$2,400, with no corresponding entries on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and

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disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

3. Please amend Schedule B supporting Line 23 by providing the full name, office sought, state and congressional district, if appropriate for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

4. Your report shows refunds of apparent independent expenditures on Schedule A supporting Line 15. Please amend Line 15 by providing the following additional information: the name, office sought, state and congressional district (if applicable) of the federal candidate, as well as the election designation and date made of the original independent expenditure.

5. Schedule B supporting Line 21(b) discloses an expenditure(s) for "mail costs, postage" and "press release (from advance line 21)." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

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contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura E. Sinram

Senior Campaign Finance Analyst

Reports Analysis Division

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